

Response to Consultation

Date: 31 March 2009

Consultation: PPS21: Sustainable Development in the Countryside.

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents 41 housing associations. This includes all 34 of the associations registered and regulated by the Department for Social Development (DSD). Collectively, these associations provide 30,000 good quality, affordable homes for renting or equity sharing. Further information is available at www.nifha.org

Background

NIFHA's members are responsible for about twenty five percent of all social housing stock in Northern Ireland and on behalf of our members; we would like to make the following comments.

Comments

NIFHA broadly supports draft PPS21 as a proposal to encourage the delivery of well-balanced communities in Northern Ireland whilst simultaneously discouraging an alarming level of sporadic development in the open countryside. However, our members have highlighted a number of key concerns and it is important that the measures used to achieve the objectives set out within this draft policy are clearly defined.

It is essential that the relevant arms of government responsible for the planning and delivery of housing developments, infrastructure, services and facilities work collectively to achieve the same overall objectives.

There is a need for a NI wide planning system which is consistent and offers protection to areas of outstanding natural beauty through only giving approval to those developments which are not sporadic and in keeping with the surrounding areas.

We would encourage good practice guidance for professional such as architects to focus on designs which are imaginative and creative, yet sensitive to the overall environment. Within the context of PPS21, we welcome the proposed commissioning of a Rural Design Guide to support good practice and act as a practical tool aimed at those responsible for the development of functional and sustainable rural communities.

The extended potential "recycling" of derelict buildings in the countryside is welcomed as it minimises the impact on the existing environment, but it is important that the level of take up is measured, as well as stipulating criteria and restrictions on what can be put in their place. Furthermore, any new developed homes on such sites should meet the "fit for purpose" requirements. It is also important that controls and restrictions are set down in order to prohibit the emergence of haphazard developments.

NIHE support is a fundamental requirement for the implementation of PPS21 as is some recognition and understanding of the Common Selection Scheme, which helps plan for housing need. The current economic climate will substantially restrict access to borrowing for those who may have previously been able to provide their own dwellings. This along with some other aspects such as an ageing population can significantly contribute to the increases in rural housing stress.

Whilst we would welcome an increase in the number of social houses as an exception to general rural housing policy it is important that where need is identified, it takes into account the needs of these communities both now and in the future, to allow for the sustainability and retention of rural settlements.

This document does not seem to embrace the objectives of Shared Future Housing and mixed tenure schemes, even though these types of developments are widely endorsed and promoted by the government and key social housing providers. To this end, we would strongly urge consideration to small clusters of rural housing schemes within designated areas to encourage ongoing activity, discourage isolation and to ensure that rural communities do not develop into “sleeping satellites”.

Although the concept of dispersed rural communities (DRCs) may be appealing, we would highlight the fact that some of our members have expressed serious concern about the actual impact of the DRC initiative. The document clearly stipulates that DRCs can only be designated via the Area Plan process but this process has been dogged by serious delays.

The “one-site-per-ten-years” restriction is acceptable although it may prove difficult with agricultural developments requiring the support of more than one household.

We trust that you will find these comments useful and our recommendations will be given due consideration.

Submitted on behalf of NIFHA by:



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